

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

BETHANY R. SCAER and  
STEPHEN SCAER

Plaintiff,

v.

CITY OF NASHUA, a municipal  
corporation; JAMES W. DONCHESS,  
Mayor, City of Nashua, in his official and  
individual capacities; JENNIFER L.  
DESHAIES, Risk Manager, City of  
Nashua, in her official and individual  
capacities,

Defendants.

Civil Action No. 1:24-cv-00277-LM-TSM

**ASSENTED – TO MOTION TO EXTEND DEADLINES**

Defendant Jennifer L. Deshaies, by her attorneys, Preti Flaherty, PLLP, pursuant to LR 7.2(a), respectfully submits the within Assented – to Motion to extend Deadlines, and in support thereof, represents as follows:

1. Plaintiffs filed their Complaint and Motion for Preliminary Injunction in this matter on September 6, 2024. A Hearing on the Motion for Preliminary Injunction was held on November 5, 2024, and the Motion is still pending.

2. In order to conserve resources and avoid incurring unnecessary legal fees the parties have agreed to postpone engaging in discovery until the Court rules on the Motion for Preliminary Injunction.

3. On November 19, 2024 the Court approved the parties' Joint Discovery Plan. On February 4, 2025 the Court approved an Amended Discovery Plan. Thereafter, on February 28,

2025 the Court granted a Joint Motion to extend the deadlines set by the February 4 Order. The parties now seek to further extend the discovery deadlines, as follows:

	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Disclosure of Plaintiffs' Experts and Experts' Written Reports	April 3, 2025	May 19, 2025
Disclosure of Defendants' Experts and Experts' Written Reports	May 5, 2025	June 19, 2025
Joinder of Additional Parties (by Plaintiffs and Defendants	May 14, 2025	June 30, 2025
Third-Party Actions	April 14, 2025	May 29, 2025
Plaintiffs' Amendment of Pleadings Deadline	May 14, 2025	June 30, 2025
Defendants' Amendment of Pleadings Deadline	June 16, 2025	July 31, 2025
Completion of Discovery	August 18, 2025	October 2, 2025
Motions to Dismiss	April 14, 2025	May 29, 2025
Motions for Summary Judgment	September 12, 2025	October 27, 2025

4. An attachment in the form of Civil Form 3 is being submitted herewith pursuant to LR 7.2(a).

5. Nathan J. Ristuccia, counsel for the Plaintiffs, Jonathan Barnes, counsel for the Defendant City of Nashua, and Adam B. Pignatelli, counsel for the Defendant Mayor Donchess, assent to this Motion and to the requested extensions.

6. Trial is scheduled for June 16, 2026 and the parties do not seek to change the trial date. Granting this Motion will not result in the continuance of trial or any other hearing or conference.

7. No memorandum of law is submitted as the authority is cited herein.

WHEREFORE, for the reasons set forth above, Defendant Jennifer L. Deshaies respectfully request this Honorable Court to:

- A. Grant this Motion;
- B. Extend the deadlines as set forth above and in the Attachment filed herewith; and
- C. Grant such other relief as may be just and proper.

Respectfully submitted,

JENNIFER L. DESHAIES

By her attorneys,

Dated: March 27, 2025

By: /s/ Peter G. Callaghan

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**CERTIFICATE OF SERVICE**

I hereby certify this 27<sup>th</sup> day of March 2025 copies of the within document have been served on all parties of record electronically via ECF.

/s/ Peter G. Callaghan

Peter G. Callaghan